

EXHIBIT I.1

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 THURSDAY, JULY 19, 2018

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

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17 Videotaped deposition of Gary L.
18 Boggs, held at the offices of The Cochran
19 Firm, D.C., 1100 New York Avenue, NW, Suite
20 340, Washington, DC, commencing at 9:05 a.m.,
21 on the above date, before Carrie A. Campbell,
22 Registered Diplomat Reporter and Certified
23 Realtime Reporter.

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25 GOLKOW LITIGATION SERVICES
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deps@golkow.com

1 Q. Yes, sir.

2 A. Not that I'm aware of, no.

3 Q. That discretion is left to
4 the -- is left to McKesson or was left to
5 McKesson, true?

6 MR. STANNER: Objection to the
7 form.

8 QUESTIONS BY MR. HAWAL:

9 Q. By the DEA?

10 A. I believe that's the case, yes.

11 Q. Have you ever seen any document
12 whereby McKesson communicated to the DEA that
13 it was incapable of identifying suspicious
14 orders or stopping their shipment?

15 A. Not that I recall, no.

16 Q. You were also identified as a
17 person most knowledgeable at McKesson about
18 controlled substance quotas, but we were told
19 that McKesson has no documents relating to
20 controlled substance quotas and does not set
21 quotas.

22 Is that familiar to you, sir?

23 MR. STANNER: Objection --

24 THE WITNESS: It's familiar to
25 me, yes.

1 MR. STANNER: -- to the form.

2 QUESTIONS BY MR. HAWAL:

3 Q. So is there any role -- does
4 McKesson play any role in setting quotas or
5 contributing to the establishment of quotas
6 for controlled substances?

7 MR. STANNER: Objection to the
8 form.

9 THE WITNESS: The Drug
10 Enforcement Administration sets the
11 quotas.

12 QUESTIONS BY MR. HAWAL:

13 Q. All right. And McKesson and
14 other distributors do not play a role in
15 that?

16 A. The only role that we would
17 play is the ARCOS reporting, the data that we
18 report via ARCOS, which is considered as part
19 of the DEA determination when setting the
20 quotas. That would be the only role that we
21 would play.

22 MR. HAWAL: All right. I don't
23 have any further questions. We are
24 going to reserve our right to reopen
25 this deposition once McKesson complies